

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

x

THU TRAN, Individually and On Behalf of All : Civil Action No. 1:07-cv-03754-RMB
Others Similarly Situated, :
Plaintiff, : CLASS ACTION
vs. :
NETLIST, INC., et al., :
Defendants. :
RAGAA BENJAMIN, Individually and On : Civil Action No. 1:07-cv-05518-RMB
Behalf of All Others Similarly Situated, :
Plaintiff, : CLASS ACTION
vs. :
NETLIST, INC., et al., :
Defendants. :
x

NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

PLEASE TAKE NOTICE that class member Iron Workers Local No. 25 Pension Fund will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing Iron Workers Local No. 25 Pension Fund as Lead Plaintiff; (iii) approving Iron Workers Local No. 25 Pension Fund's selection of the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Iron Workers Local No. 25 Pension Fund submits herewith a Memorandum of Law and Declaration of David A. Rosenfeld dated July 27, 2007.

DATED: July 27, 2007

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN (SR-7957)
DAVID A. ROSENFELD (DR-7564)
MARIO ALBA, JR. (MA-7240)

/s/ David A. Rosenfeld
DAVID A. ROSENFELD

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[Proposed] Lead Counsel for Plaintiff

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CERTIFICATE OF SERVICE

I, David A. Rosenfeld, hereby certify that on July 27, 2007, I caused a true and correct copy of the attached:

Notice Of Motion For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel;

Memorandum In Support Of The Motion Of Iron Workers Local No. 25 Pension Fund For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel;

Declaration of David A. Rosenfeld In Support Of The Motion Of Iron Workers Local No. 25 Pension Fund For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel on the attached service list.

s/ David A. Rosenfeld

DAVID A. ROSENFELD

NETLIST (NY)

Service List - 7/25/2007 (07-0131N)

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